

1 FARHAN R. NAQVI
Nevada Bar No. 8589
2 PAUL G. ALBRIGHT
Nevada Bar No. 14159
3 NAQVI INJURY LAW
9500 W. Flamingo Road, Suite 104
4 Las Vegas, Nevada 89147
5 Telephone: (702) 553-1000
Facsimile: (702) 553-1002
6 naqvi@naqvilaw.com
paul@naqvilaw.com
7 *Attorneys for Plaintiff*

8 **UNITED STATES DISTRICT COURT**
9
10 **DISTRICT OF NEVADA**

11 LISA YALOVICH, individually,
12 Plaintiff,

13 vs.

14 COSTCO WHOLESALE CORPORATION
15 d/b/a COSTCO WHOLESALE; FALCON
16 FARMS, INC. a/k/a FALCON FARMS;
DOES 1 through 100 and ROE
17 CORPORATIONS 1 through 100, inclusive,

18 Defendants.

19 COSTCO WHOLESALE CORPORATION,
20 Cross-claimant,

21 vs.

22 FALCON FARMS, INC. a/k/a FALCON
23 FARMS and ROES 1-10, inclusive,

24 Cross-defendant.
25

Case No.: 2:20-cv-01263-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FOURTH REQUEST)**

26 Plaintiff LISA YALOVICH ("Plaintiff"), by and through her attorneys of record,
27 FARHAN R. NAQVI and PAUL G. ALBRIGHT of the law firm NAQVI INJURY LAW,
28 Defendant/Cross-Claimant COSTCO WHOLESALE CORPORATION d/b/a COSTCO



1 WHOLESALE (“Defendant COSTCO”), by and through its attorney of record, MICHAEL A.
2 FEDERICO of the law firm OLSON CANNON GORMLEY & STOBERSKI, and
3 Defendant/Cross-Defendant FALCON FARMS, INC. (“Defendant FALCON FARMS”) by and
4 through its attorney of record, TROY E. PEYTON of the law firm PYATT SILVESTRI, hereby
5 submit this **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**
6 **(FOURTH REQUEST)** pursuant to LR 26-4 for the Court’s consideration.
7

8 **I.**

9 **DISCOVERY COMPLETED TO DATE**

- 10 1. A Rule 26(f) Case Conference was held and a Discovery Plan/Scheduling Order was filed.
- 11 2. Plaintiff has made initial disclosures, and five (5) supplements thereto.
- 12 3. Defendant COSTCO has made initial disclosures, and twelve (12) supplements thereto.
- 13 4. Plaintiff served requests for production to Defendant COSTCO, to which responses were
14 provided.
- 15 5. Plaintiff served interrogatories to Defendant COSTCO, to which responses were provided.
- 16 6. Defendant COSTCO served requests for production to Plaintiff, to which responses were
17 provided.
- 18 7. Defendant COSTCO served interrogatories to Plaintiff, to which responses were provided.
- 19 8. Defendant COSTCO served requests for admissions to Plaintiff, to which responses were
20 provided.
- 21 9. Subpoena duces tecum have been sent to various facilities and entities requesting records.
- 22 10. Deposition of Plaintiff.
- 23 11. A site inspection was performed on April 15, 2021.
- 24 12. Defendant COSTCO made expert disclosures.
- 25
- 26
- 27
- 28



1 13. Plaintiff made expert disclosures.

2 14. Plaintiff provided Defendant FALCON FARMS with discovery and pleadings filed prior
3 to Defendant FALCON FARMS' entrance into the case.

4 15. Plaintiff served interrogatories to Defendant FALCON FARMS, to which responses were
5 provided.

6 16. Plaintiff served requests for production to Defendant FALCON FARMS, to which
7 responses were provided.

8 17. Deposition of Plaintiff's husband.

9
10 **II.**

11 **DISCOVERY TO BE COMPLETED**

- 12
13 1. Depositions of various witnesses including, but not limited to: Defendants FRCP;
14 30(b)(6) representative(s); Plaintiff's treating physicians; Experts; and other witnesses.

15 **III.**

16 **WHY DISCOVERY CANNOT BE COMPLETED IN THE TIME PROVIDED BY THE**
17 **SCHEDULING ORDER**

18 The parties represent that good cause exists for extending the discovery deadlines in this
19 matter. This is a multi-party case arising from an incident wherein Plaintiff tripped and fell on
20 property owned and/or maintained by Defendants. The parties have been attempting to schedule
21 the depositions of Defendants' COSTCO and FALCON FARMS respective FRCP 30(b)(6)
22 designees and employees, but the same have been delayed by counsel's respective trial schedules
23 as well as the inherent difficulty in coordinating depositions around the schedules of three (3)
24 separate counsel and their clients. Moreover, the parties are still discussing potential resolution
25 of this case. Based on the foregoing, the parties are requesting a brief extension of the deadlines
26 as outlined below.
27
28



IV.

PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

DISCOVERY	PROPOSED DEADLINE
Amend Pleadings	Closed
Initial Expert Disclosure	Closed
Rebuttal Expert Disclosure	Closed
Close of Discovery	August 22, 2022
Dispositive Motions	September 20, 2022
Pretrial Order	October 21, 2022

This Stipulation to Extend is made in good faith and not for purposes of delay.

DATED this 17th of June, 2022

DATED this 17th of June 2022

NAQVI INJURY LAW

OLSON CANNON GORMLEY &
STOBERSKI

/s/ Paul G. Albright

/s/ Michael A. Federico

PAUL G. ALBRIGHT
Nevada Bar No. 1415
9500 W Flamingo Road, Suite 104
Las Vegas, Nevada 89147
Attorneys for Plaintiff

MICHAEL A. FEDERICO
Nevada Bar No. 5946
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
Attorneys for Defendant Costco Wholesale Corporation

DATED this 17th of June, 2022

PYATT SILVESTRI

/s/ Troy E. Peyton

Troy E. Peyton
Nevada Bar no. 1188
701 Bridger Ave., Suite 600
Las Vegas, Nevada 89101
Attorney for Defendant Falcon Farms, Inc.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: June 17, 2022